

**Ashley M. Gjøvik, JD**  
*In Propria Persona*  
(415) 964-6272  
ashleymgjojik@protonmail.com  
Boston, MA

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF MASSACHUSETTS**

**IN RE:**

**ASHLEY M. GJOVIK.**

**CHAPTER 7 CASE NO: 25-11496**

**A.P. No. 25-01104**

**JUDGE CHRISTOPHER J. PANOS**

**DEBTOR'S MOTION FOR  
ORDER TO SHOW CAUSE  
AND SANCTIONS AGAINST  
CREDITOR APPLE INC.**

**CREDITOR NO. 21011446**

**PROOF OF SERVICE**

**FED. R. BANKR. P. RULE 9013**

## CERTIFICATE & PROOF OF SERVICE

1. My name is Ashley Marie Gjovik. I am a self-represented Debtor in this above captioned matter. This is a Certificate and Proof of Service in **Debtor's Motion For Order To Show Cause And Sanctions Against Creditor Apple Inc.**

2. I hereby certify that a true and correct copy of this Motion with Declaration and Exhibits was filed to the Bankruptcy Court's electronic filing system via email to the Pro Clerk on August 28 2025.

3. I hereby certify that a true and correct copy of this Motion with Declaration and Exhibits was served upon Trustee Mark G. DeGiacomo via email (mdegiacono@harrisbeachmurtha.com and jbabula@harrisbeachmurtha.com).

4. I hereby certify that Apple was served a true and correct copy of this Motion with Declaration and Exhibits via email to General Counsel Kate Adams at kate.adams@apple.com; and to Apple's Orrick, Herrington & Sutcliffe legal counsel: Ryan Booms rbooms@orrick.com, Jessica Perry jperry@orrick.com, Melinda Reichert mrieichert@orrick.com, Kathryn Mantoan kmantoan@orrick.com on August 28 2025.

5. I hereby certify that Apple and the U.S Court are noticed via posting a true and correct copy of this Motion with Declaration and Exhibits to the federal docket for *Gjovik v. Apple Inc*, 3:23-cv-04597-EMC (N.D. Cal.) on August 28 2025 at Dkt. 252.

6. I hereby certify that Debtor's July 23 2025 Consumer Financial Protection Bureau whistleblower tip was provided a true and correct copy of this Motion with Declaration and Exhibits via email on August 28 2025.

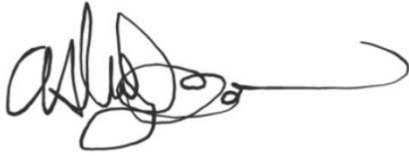
7. I hereby certify that USPS mail service of Goldman Sachs Bank USA has been initiated and addressed to Salt Lake City Branch, Lockbox 6112, P.O. Box 7247, Philadelphia, PA 19170. Service is via USPS Priority Mail with Signature Service under tracking No. 9410 8301 0935 5005 7700 14.

8. I hereby certify that true and correct copies of proofs of the above service are attached as exhibits.

9. I declare under penalty of perjury under the laws of the United States of America, and in compliance with Fed.R.Bankr.P. Rule 9011, that the foregoing is true and correct.

Executed on August 28 2025 in Boston, Massachusetts.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ashley M. Gjovik', with a long horizontal flourish extending to the right.

---

**/s/ Ashley M. Gjovik**

*In Propria Persona*

18 Worcester Square, Apt 1

Boston, MA 02118

Dated: August 28 2025

# EXHIBITS

Service in Bankruptcy Case 25-11496: Debtor’s Motion For Order To Show Cause and Sanctions Against Creditor Apple Inc.

From Ashley Gjovik <ashleymgjovik@protonmail.com>  
To Jennifer Babula <jbabula@harrisbeachmurtha.com>, Mark G. DeGiacomo <mdegiacomo@harrisbeachmurtha.com>, kate.adams@apple.com, Booms, Ryan <rbooms@orrick.com>, Mantoan, Kathryn G. <kmantoan@orrick.com>, Riechert, Melinda <mriechert@orrick.com>, Perry, Jessica R. <jperry@orrick.com>, Romero, Josette L. <jromero@orrick.com>  
Date Thursday, August 28th, 2025 at 1:44 PM

Hello,

Today, August 28 2025, I efiled a Motion in Chapter 7 Bankruptcy case 25-11496 requesting a Motion For Order To Show Cause and Sanctions Against Creditor Apple Inc. (and possibly also Goldman Sachs Bank, leaving that to the court's discretion).

Due to local rules, I'm unable to file directly on PACER and instead have emailed the Pro Se Clerk and they will post it at some point.

I'm also serving you notice via email with the Motion, Declaration, Exhibits, and confirmation of efilings attached.

-Ashley

—  
**Ashley M. Gjovik**  
**BS, JD, PMP**

Sent with [Proton Mail](#) secure email.

7.00 MB 12 files attached

- In Re Gjovik Apple Motion to Show Cause Declaration.pdf 88.85 KB
- Exhibit B Apple Debtor 341.pdf 219.31 KB
- Exhibit D CFPB Tip 20250723.pdf 250.86 KB
- EFILING 20250828.pdf 124.39 KB
- In Re Gjovik Apple Motion to Show Cause 20250828.pdf 250.59 KB
- Exhibit G Apple Orrick Ryan Booms.pdf 250.43 KB
- Exhibit E Apple Trustee Gjovik 20250825 Emails.pdf 535.48 KB
- Exhibit A Emails about Apple Card Trustee.pdf 387.04 KB
- Exhibit F Apple Card Twitter 20250721.pdf 826.02 KB
- Exhibit H 20250825 Apple CAND Filings Serve.pdf 830.29 KB
- Exhibit I CAND Dkt 250 Opposition to Motion to Stay.pdf 1.06 MB
- Exhibit C CFPB 2024.pdf 2.27 MB

Pro Se filing in Bankruptcy Case 25-11496: Debtor’s Motion For Order To Show Cause And Sanctions Against Creditor Apple Inc.

From Ashley Gjovik <ashleymgjovik@protonmail.com>  
To MABdb\_Prose\_Filings<prose\_filings@mab.uscourts.gov>  
Date Thursday, August 28th, 2025 at 1:30 PM

Hello,

I am the Debtor in Bankruptcy Case 25-11496 and I am filing a Motion.

Per local rules, I am efilng by emailing the Pro Se Clerk. Please note - because these are being concurrently filed with a civil case in the Northern District of California (*Gjovik v Apple*, 3:23-cv-04597), I will be immediately efilng on PACER copies of this email as proof of filing along with the attached documents.

**Filing:** Debtor’s Motion For Order To Show Cause and Sanctions Against Creditor Apple Inc.

Apple Inc is Creditor no. 21011446.

A supporting Declaration and Exhibits (A-I) are attached.

Thank you,  
-Ashley

—  
**Ashley M. Gjovik**  
**BS, JD, PMP**

Sent with [Proton Mail](#) secure email.

6.88 MB 11 files attached

- Exhibit B Apple Debtor 341.pdf 219.31 KB
- Exhibit G Apple Orrick Ryan Booms.pdf 250.43 KB
- Exhibit D CFPB Tip 20250723.pdf 250.86 KB
- Exhibit A Emails about Apple Card Trustee.pdf 387.04 KB
- In Re Gjovik Apple Motion to Show Cause v3.pdf 250.59 KB
- Exhibit E Apple Trustee Gjovik 20250825 Emails.pdf 535.48 KB
- Exhibit H 20250825 Apple CAND Filings Serve.pdf 830.29 KB
- Exhibit F Apple Card Twitter 20250721.pdf 826.02 KB
- Exhibit I CAND Dkt 250 Opposition to Motion to Stay.pdf 1.06 MB
- Exhibit C CFPB 2024.pdf 2.27 MB
- In Re Gjovik Apple Motion to Show Cause Declaration.pdf 88.85 KB

## Activity in Case 3:23-cv-04597-EMC Gjovik v. Apple Inc. Notice (Other)

From ECF-CAND@cand.uscourts.gov <ECF-CAND@cand.uscourts.gov>  
To efiling@cand.uscourts.gov  
Date Thursday, August 28th, 2025 at 1:54 PM

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

California Northern District

### Notice of Electronic Filing

The following transaction was entered on 8/28/2025 at 10:54 AM and filed on 8/28/2025

**Case Name:** Gjovik v. Apple Inc.  
**Case Number:** [3:23-cv-04597-EMC](#)  
**Filer:** Ashley M Gjovik  
**Document Number:** [252](#)

#### Docket Text:

**NOTICE by Ashley M Gjovik re [250] Opposition/Response to Motion, Plaintiff/Debtors Motion For Order To Show Cause And Sanctions Against Creditor Apple Inc. (Attachments: # (1) Declaration, # (2) Certificate/Proof of Service, # (3) Exhibit, # (4) Exhibit, # (5) Exhibit, # (6) Exhibit, # (7) Exhibit, # (8) Exhibit, # (9) Exhibit, # (10) Exhibit, # (11) Exhibit)(Gjovik, Ashley) (Filed on 8/28/2025)**

#### 3:23-cv-04597-EMC Notice has been electronically mailed to:

Ashley M Gjovik ashleymgjovik@protonmail.com

Jessica Perry jperry@orrick.com, tmcbride@orrick.com

Kathryn Grzenczyk Mantoan kmantoan@orrick.com, vmorse@orrick.com

Melinda S. Riechert mriechert@orrick.com, jromero@orrick.com

Ryan Booms rbooms@orrick.com

#### 3:23-cv-04597-EMC Please see [Local Rule 5-5](#); Notice has NOT been electronically mailed to:

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**C:\fakepath\In Re Gjovik Apple Motion to Show Cause 20250828.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-0]  
[24dda3691264707415473a8d559338cd3227084394b92010c5eea54ba10c2c33b45c]

bceda47fb61ff78856ca083a6d695000b4549ab94a3958c86aa6b99f02cd]]

**Document description:**Declaration

**Original filename:**C:\fakepath\In Re Gjovik Apple Motion to Show Cause Declaration.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-1]  
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**Document description:**Certificate/Proof of Service

**Original filename:**C:\fakepath\In Re Gjovik Apple Motion to Show Cause Service and Efiling.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-2]  
[5564ff7ccda35a796aba9cfb498a29d40fbbee5516af4cdf18b1cf345bacf68c578  
43ff8bfe1078b44cf255c194e7542d89a79f84a71bda54b6bb8707223212]]

**Document description:**Exhibit

**Original filename:**C:\fakepath\Exhibit A Emails about Apple Card Trustee.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-3]  
[0a5c0d4bb74697b41a8e4d9f014a5394dfb4d00bb885187b1fc2536c93752800194d  
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**Document description:**Exhibit

**Original filename:**C:\fakepath\Exhibit B Apple Debtor 341.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-4]  
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a11aebca72e19569f61cd58f6a2ab5ccb99403573236703738346923094e]]

**Document description:**Exhibit

**Original filename:**C:\fakepath\Exhibit C CFPB 2024.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-5]  
[a78f44feb7c10517ac4eb583b00e3ab1f0ed1d614a65b40d03be362f369dee47c14a  
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**Document description:**Exhibit

**Original filename:**C:\fakepath\Exhibit D CFPB Tip 20250723.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-6]  
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**Document description:**Exhibit

**Original filename:**C:\fakepath\Exhibit E Apple Trustee Gjovik 20250825 Emails.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-7]  
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**Document description:**Exhibit

**Original filename:**C:\fakepath\Exhibit F Apple Card Twitter 20250721.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-8]  
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6b98831dc427f39474520b90b87663b4f7db67d1215f000df47bd8128cf6]]

**Document description:**Exhibit

**Original filename:**C:\fakepath\Exhibit G Apple Orrick Ryan Booms.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-9]  
[4db84a736781bc0b4adb2dd9c1cc286120841ce147f35f32ce8396772f0aa2f4ea1a



f39d38335abd5f8ccf92d3cebec0541433717a73824b2321b732d141c705]]

**Document description:**Exhibit

**Original filename:**C:\fakepath\Exhibit H 20250825 Apple CAND Filings Serve.pdf

**Electronic document Stamp:**


[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-10  
] [3dad843655c0e95331c3c7bc10f31ba2e7be0e1af5b6106a020a386d375922b43ab  
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**Document description:**Exhibit

**Original filename:**C:\fakepath\Exhibit I CAND Dkt 250 Opposition to Motion to Stay.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/28/2025] [FileNumber=22736030-11  
] [34277a206292d4820889b8583b9997b6648d577445419e2b981be2f9e51eca2c1b9  
41fab7d69c5b6fe4671771ce66c1c9e69f2cae1aed2b62c73482ee1c29c3e]]

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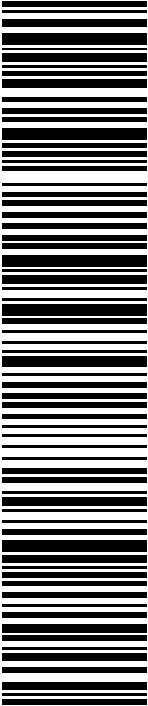
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## Re: CFPB Whistleblower Tip: Possible Fraudulent Statements Made by Apple & Goldman Sachs re: Apple Card Enforcement Action

From Ashley Gjovik <ashleymgjovik@protonmail.com>

To whistleblower@cfpb.gov

Date Thursday, August 28th, 2025 at 3:13 PM

### Update to July 23, 2025 Whistleblower Tip - Additional Evidence of Apple Card Pre-Launch Employee Program and Related Misconduct

Dear CFPB Enforcement Staff,

I am providing this update to my July 23, 2025 whistleblower tip regarding Apple Inc.'s unauthorized employee enrollment in the Apple Card program months before the August 2019 public launch, a launch that CFPB found was already premature.

**Background Recap:** In my original tip, I reported that Apple enrolled employees in the Apple Card "seed" or "beta" program starting in April 2019, approximately four months before the August 20, 2019 public launch. Your October 23, 2024 enforcement actions (File Nos. 2024-CFPB-0011 and 2024-CFPB-0012) found that Apple and Goldman Sachs launched the public program despite warnings on August 16, 2019 that the system "was not fully ready." My tip indicated the employee program predated even this premature public launch by several months.

**New Evidence and Developments:** I am attaching copies of federal court filings that provide additional evidence supporting my original tip and revealing a broader pattern of misconduct by Apple Inc. This Bankruptcy Court Motion for Order to Show Cause filed August 28, 2025 with attached exhibits documents Apple's attempts to manipulate bankruptcy procedures and U.S. Court proceedings in order to avoid accountability for the disputed Apple Card debt and related litigation. It also includes a copy of Apple's sworn filings to federal court, and my Opposition Brief, which details Apple's false statements about legal procedures and systematic interference with federal proceedings in an apparent attempt to obstruct further investigation into this topic, among other improper objectives.

**Request for Investigation:** I respectfully request CFPB review whether:

1. The April 2019 employee enrollment program violated additional consumer protection statutes beyond those addressed in your October 2024 enforcement actions
2. Apple's current conduct regarding disputed Apple Card debts constitutes ongoing violations
3. The employee "beta" program created undisclosed risks or obligations for participating employees

The attached federal court filings show Apple's continued attempts to avoid accountability for these practices, suggesting the original violations may warrant additional enforcement action.

Because I discussed this prior CFPB tip in my filings, I also noted I would provide service of a courtesy copy of these filings to the agency.

I remain available to provide additional information, evidence, and/or testimony as needed.

Respectfully,

Ashley M. Gjovik  
[ashleymgjovik@protonmail.com](mailto:ashleymgjovik@protonmail.com)  
(415) 964-6272

—  
**Ashley M. Gjovik**  
**BS, JD, PMP**

Sent with [Proton Mail](#) secure email.

On Wednesday, July 23rd, 2025 at 1:03 PM, Ashley M. Gjovik <ashleymgjovik@protonmail.com> wrote:

Hello,

## CFPB Whistle Blower - AutoReply

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From CFPB\_WHISTLEBLOWER <CFPB\_WHISTLEBLOWER@cfpb.gov>

To Ashley Gjovik <ashleymgjovik@protonmail.com>

Date Thursday, August 28th, 2025 at 3:16 PM

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Thank you for contacting CFPB. The information you provided may help inform CFPB's priorities and investigations.

Please be aware that we cannot take in privileged information, which is any information that you obtained through your role as an attorney for the company you are reporting.

If you contacted CFPB for assistance resolving an issue that affected you personally, please submit your complaint to our Consumer Response team at (855) 411-CFPB (2372) or <http://www.consumerfinance.gov/complaint/>.

If you perform work related to a bank or other consumer financial service provider and you report or object to a possible violation of consumer financial protection laws, you may be protected from employment retaliation. You have 180 days from the date of retaliation to submit a complaint to the Department of Labor. For further details, visit [http://www.whistleblowers.gov/acts/dfa\\_1057.html](http://www.whistleblowers.gov/acts/dfa_1057.html).

Regards,

Consumer Financial Protection Bureau